Case 23-16132-JKS Doc 45 Filed 10/24/24 Entered 10/24/24 16:19:23 Desc Main

Document Page 1 of 3

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J.LBR 9004-1

STEWART LEGAL GROUP, P.L.

Formed in the State of Florida Gavin N. Stewart, Esq. Of Counsel to Bonial & Associates, P.C. 401 East Jackson Street, Suite 2340 Tampa, FL 33602

Tel: 813-371-1231/Fax: 813-371-1232 E-mail: gavin@stewartlegalgroup.com Attorney for Global Lending Services LLC

In re:

Mirtha D. Perez aka Mirtha C Perez aka Mirtha De la Caridad Perez aka Mirtha Perez

Debtor.

Sand Sand Court for Illa Opinics of No.

Order Filed on October 24, 2024 by Clerk U.S. Bankruptcy Court District of New Jersey

Chapter: 13

Case No.: 23-16132-JKS

Hearing Date: October 10, 2024

Judge John K. Sherwood

CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM THE AUTOMATIC STAY

The relief set forth on the following pages is hereby **ORDERED**.

DATED: October 24, 2024

Honorable John K. Sherwood United States Bankruptcy Court Debtor: Mirtha D. Perez Case No.: 23-16132-JKS

Caption of Order: CONSENT ORDER RESOLVING MOTION FOR RELIEF FROM

THE AUTOMATIC STAY

THIS MATTER having been opened to the Court upon the Motion for Relief from the Automatic Stay ("Motion") filed by Global Lending Services LLC ("Creditor"), and whereas the underlying is current as of September 24, 2024, and whereas the Debtor and Creditor seek to resolve the Motion, it is hereby **ORDERED**:

- 1. The automatic stay provided under 11 U.S.C. §362(a) shall remain in effect as to Movant's interest in the following property: **2019 Lexus NX; VIN: JTJBARBZ1K2196251** provided that the Debtor complies with the following:
 - a. The Debtor shall resume making the regular contractual monthly payments directly to the Creditor as each becomes due, beginning with the October 8, 2024
 payment and continuing thereon per the terms of the underlying Contract.
- 2. All payments due hereunder shall be sent directly to Creditor at the following address: Global Lending Services, LLC, 1200 Brookfield Boulevard, Suite 300, Greenville, SC 29603.
- 3. The Debtor will be in default under the Consent Order if the Debtors fail to comply with the payment terms and conditions set forth in above paragraphs and/or if the Debtors fail to make any payment due to Creditor under the Chapter 13 Plan.
- 4. If the Debtors fail to cure the default within thirty (30) days from the date of default, Creditor may submit a Certificate of Default to the Court on fourteen (14) days' notice to counsel for Debtors and the Chapter 13 Trustee for an order lifting the automatic stay imposed under 11 U.S.C. § 362(a), and permitting Creditor to exercise any rights under the loan documents with respect to the above vehicle.

Case 23-16132-JKS Doc 45 Filed 10/24/24 Entered 10/24/24 16:19:23 Desc Main Document Page 3 of 3

5. Creditor is awarded reimbursement of attorney fees and costs in the amount of \$250.00 and \$199.00, respectively to be paid through the Chapter 13 Plan.

STIPULATED AND AGREED:

/s/ Jamal J. Romero
Jamal J. Romero, Esq.
Scura, Wigfield, Heyer & Stevens
1599 Hamburg Turnpike
Wayne, NJ 07470
Counsel for Debtor

/s/ Gavin N. Stewart
Gavin N. Stewart, Esq.
Stewart Legal Group, P.L.
401 East Jackson Street, Suite 2340
Tampa, FL 33602
Counsel for Creditor